

Westminster Oxford Street District

5 December 2018

<http://www.osd.london/>

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups.

General comments on this strategy:

This strategy is opposed.

It fails to give clear details how the area will see reduced motor traffic in any meaningful sense, and the vague approaches that are outlined include ones that could even do the opposite – and increase motor traffic in the area.

The lack of concrete commitments, clear metrics and specific proposals in the strategy must also be considered alongside Westminster Council's both recent and long-standing history of opposition to schemes that are positive for cycling particularly, but also often to schemes that improve matters for those walking, and indeed opposition to removing or restricting car access and parking space at all.

Considering the vagueness of the strategy, the inclusion of several troubling statements and approaches and Westminster Council's past performance, while the ambitions enshrined in this document are theoretically worthwhile, the document does not give any guarantee that following its implementation, Oxford Street will be significantly less of a polluted, dangerous and hostile environment for those walking and cycling. And there is no guarantee from these proposals that the entire area will not remain dominated by far too much motor traffic – blighting the lives of residents, workers and visitors.

Specific points on this strategy:

- The lack of intent to significantly reduce motor traffic movements in the area is highlighted by several key phrases in the document. Two of the primary methods proposed to reduce motor traffic are "encouraging use of public transport, walking and cycling" and "improve and address existing traffic congestion issues on the surrounding road network to provide less incentive for rat-running". This has to be stacked alongside Westminster Council's constant opposition to removal of car parking, restriction of car access etc.

- Encouraging alternatives to motor vehicles, without clearly enabling them to such an extent that they become more comfortable, safer and more convenient than motor vehicle use (and that can also mean reducing the amenity of motor vehicles) has been shown over and over to fail. Again, the wording indicates a ‘business as usual’ approach from a borough that has long been actively opposed to motor vehicle reduction and ‘active travel’ alternatives.
- In the same vein, the well-established and studied concepts of “induced demand” and “traffic evaporation” make clear that addressing “existing traffic congestion issues on the surrounding road network” (i.e. nearby main or distributor roads) simply will result in the same level of “rat-running” while increasing capacity and therefore demand for motor vehicle journeys on the “surrounding” network. The net result is likely to be, if this approach is taken, that overall motor vehicle journey volumes go up, not down, across the area. This is probably one of the clearest signals that Westminster Council has failed in any meaningful way to grasp core concepts around reducing motor traffic and enabling alternatives.
- LCC original consultation responses (http://s3.amazonaws.com/lcc_production_bucket/files/11966/original.pdf?1497367581 and https://s3.amazonaws.com/lcc_production_bucket/files/12353/original.pdf?1513860147) to TfL’s proposals stand. These can be summarised as:
 - Motor traffic should, ideally, be completely removed from Oxford Street.
 - East-west cycle routes must be on, or near to Oxford Street (on both sides), and they must be high-quality and high-capacity and link appropriately onwards to strategic cycling routes (including those identified on TfL’s Strategic Cycling Analysis).
 - Large volumes of high-quality cycle parking should be located on, or very near to, Oxford Street.
 - North-south cycle routes must cross Oxford Street and connect to other nearby strategic cycle routes (including those identified on TfL’s Strategic Cycling Analysis); routes parallel to Oxford Street must connect to and across it at frequent intervals.
 - Through motor traffic, including taxi routes, should be restricted or removed by creating “low traffic neighbourhoods” throughout the area.
 - Delivery consolidation, bus route changes and other measures to reduce motor traffic should be included.
- Westminster Council’s (recent) history on cycling schemes gives no confidence at all it is willing or able to meaningfully improve cycling in the area. It is telling that key improvements for cycling listed in the consultation include: “advanced cycle stop lines, safer lane widths, reduced traffic speeds and reduced traffic volumes... improved and maintained roads, contraflow cycling on one-way streets and increased levels of cycle parking”. None of these measures alone, or combined, are likely to lead to a significant increase in cycling rates or enable a wider range of people to cycle in, to, or through the area.

- LCC worked for a long period with TfL, Westminster Council officers, and their consultants on the potential parallel cycle routes in TfL's proposals. For both alignments:
 - Westminster Council were the primary barrier to achieving a suitable quality of route.
 - The schemes were not at the quality level required to enable a significantly wider range of or higher volume of people to cycle in the area at the point Westminster ceased working on the proposals.
 - It was clear that Westminster Council at the time were ill prepared to tackle resident concerns or show leadership over any loss of on-street parking, nor any restriction to through motor traffic on the streets proposed, to achieve a high-quality scheme.
 - Of the schemes that were being worked on, the northern route was welcome as a separate scheme, connecting the Paddington area to the existing Camden Tavistock Place scheme. However it was too far from Oxford Street to count as a worthwhile parallel to it. The southern alignment had promise, but would require a crossing of Regent Street and significant motor traffic reductions/restrictions along its route to be of high quality, and there was no sign that Westminster Council were willing to engage with such an approach.

- It is unlikely under the current proposals for Oxford Street that the street will feature less than 2,000 Passenger Car equivalent Units (PCUs) of motor vehicle movements daily. This is the level below which LCC policy would enable cycling without separation from motor traffic – however it is impossible to fully assess whether the proposals that have been put forward would achieve such reductions.

- It is also likely that any scheme that saw those cycling sharing with motor traffic on Oxford Street itself would suffer several “critical issues” in TfL’s Healthy Streets Check, particularly “interaction between large vehicles and people cycling”, “collision risk between people cycling and turning motor vehicles”, “impact of parking and loading on cycling” and potentially even “total volume of two way motorised traffic”.

- The proposals appear to suggest that cycling on Oxford Street would be likely to be in relatively narrow lanes where those cycling would be unable to “filter”, but rather would be forced to hold the “primary” position among buses, delivery vehicles and/or taxis, the result would be congested and hostile cycling conditions. Again, it is unlikely under these proposals that Oxford Street could be considered a place where cycling is enabled, nor could it be considered part of the strategic cycling network.

- The example proposals in the delivery plan again point to a strategy where motor vehicle traffic in the area is unlikely to be significantly reduced. The Marble Arch proposals retain a hostile and motor-traffic-dominated gyratory, and fail even to join the islands by removing the road between them. Oxford Circus proposals are unclear as to whether all motor traffic is proposed to be removed from Oxford Street directly to either side of Regent’s Street. But again, given Westminster Council’s unwillingness to remove motor traffic from even the smallest streets in the area thus far, it seems certain that the proposals would fail to reduce motor traffic dominance

in the area before the arrival of Crossrail, despite the existing huge volumes of pedestrians.

- Given the level of detail lacking in the strategy thus far, further assessment of the schemes as they come forward, on an individual basis and on the likely impact in achieving the overall strategy, will be required.

General points about infrastructure schemes:

- LCC requires infrastructure schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all "critical issues" eliminated.